



## State of New Jersey

James E. McGreevey  
Governor

Department of Environmental Protection

Bradley M. Campbell  
Commissioner

Christopher Anderson  
Director Environmental Affairs  
L.E. Carpenter and Company  
33587 Walker Road  
Avon Lake, OH 44012

JUN 30 2004

Re: L.E. Carpenter Superfund Site  
Wharton, Morris County, New Jersey

The New Jersey Department of Environmental Protection (NJDEP or Department) has completed a review of the Quarterly Monitoring Report - 1<sup>st</sup> Quarter 2004 dated April 29, 2004. This document was prepared by RMT, Inc. on behalf of L.E. Carpenter and Company (LE). The NJDEP finds the document to be acceptable provided the following comments are addressed.

### General Comments:

The NJDEP noted the increase in the DEHP levels in well MW-11D(R) in the 3<sup>rd</sup> quarter. This well monitors the deep overburden aquifer and is installed in the heart of the product plume. The deep overburden aquifer is unimpacted by site related contamination, but recently there has been a steady increase in DEHP levels, followed by non-detect for three-quarters. LE indicates that these wells will be abandoned and sealed. LE should be aware that the NJDEP cannot concur with this proposal at this time. Several additional quarters of sampling must be completed before the Department can approve this proposal.

### Specific Comments:

**Low Flow Sampling:** In the review of the 4<sup>th</sup> quarter 2003, sampling report, the Department required that LE profile sample each well in the sampling program to identify the most contaminated zone. One low-flow sample at the center of each five-foot screen interval must be collected. Once the most contaminated zone is identified, subsequent sampling will target this zone. LE must also periodically profile sample the monitoring wells to confirm that the most contaminated zone is being sampled. The most contaminated zone can change due to climatic conditions, ground water stresses, etc. It is noted that LE has not completed this requirement. The NJDEP requests that this requirement be completed.

**Page 4-1, Water Table Elevations:** LE discusses ground water elevations and ground water flow direction. A review of Figure 4, Site Wide Shallow Groundwater Contour Map, 1<sup>st</sup> Quarter 2004, indicated that LE may need to reexamine the contouring. For example, the ground water elevation reported at WP-A9 is 626.80. This value is greater than the upgradient 626.0 contour and the next downgradient 625.5 contour. Several other areas should also be reexamined. The NJDEP assumed water levels were gauged prior to the EFR activities.

Should you have any questions please feel free to contact me at (609) 633-1416.

Sincerely,

Anthony Cinque, Case Manager  
Bureau of Case Management



C: Nick Clevett, RMT  
Steve Cipot, USEPA  
George Blyskun, BGWPA  
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